# IN THE DISTRICT COURT OF THE UNITED STATES FOR THE MIDDLE DISTRICT OF ALABAMA, NORTHERN DIVISION

FRED L. PLUMP,

Plaintiff.

v.

HONORABLE BOB RILEY, as Governor of the State of Alabama.

Defendant.

CIVIL ACTION NO. 2:07-cv-01014-MEF-CSC

## Plaintiff's Motion for Attorneys' Fees and Costs

- 1. The plaintiff files this motion under Rule 54(d)(2).
- 2. The Court granted judgment to the plaintiff on 22 January 2008 and amended the judgment on 25 January 2008.
- 3. The plaintiff's attorneys are entitled to reasonable attorneys' fees and other reasonable litigation expenses as part of the costs under 42 U.S.C. § 1973ℓ and 42 U.S.C. § 1988.
- 4. The plaintiff seeks fees and expenses for his counsel in the approximate amount of \$58,000.00.
- 5. The plaintiff prays that the Court will set a reasonable schedule to allow the parties to present evidence on this motion, and after considering the evidence grant fees and expenses as requested.

### Submitted by,

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/s/ Edward Still **Edward Still** Edward Still Law Firm LLC 2112 11th Avenue South Suite 201 Birmingham AL 35205-2844 phone: 205-320-2882 fax: 877-264-5513

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#### CERTIFICATE OF SERVICE

I certify that on 8 February 2008 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following attorneys:

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/s/ Edward Still